INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

December 30, 2003

TO: Interested Parties / Applicant

RE: Johns Manville / SPR 099-17820-00042

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

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December 30, 2003

Mr. Raymond Darmer
Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506

Re: **099-17820-00042**
Second Significant Revision to
FESOP 099-8546-00042

Dear Mr. Darmer:

Johns Manville was issued a permit on June 15, 1999 for a rigid polyisocyanurate foam panel manufacturing source. A letter requesting changes to this permit was received on August 15, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

Johns Manville submitted an application to the OAQ requesting to shorten the official name of the company from Johns Manville International to Johns Manville, and to request some changes to the emission unit descriptions. The company also requested to amend some compliance monitoring requirements, and to update the source-wide potential emissions from existing equipment based on recent stack test results. An insignificant welding activity is also being added.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES
cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Branch - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR QUALITY

Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 099-8546-00042	
Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 15, 1999 Expiration Date: June 15, 2004
First Administrative Amendment: AA 099-12050	Issuance Date: April 5, 2000
First Reopening: R 099-13086	Issuance Date: September 25, 2001
First Significant Permit Revision: SPR 099-14499	Issuance Date: October 16, 2001
Second Significant Permit Revision No.: SPR 099-17820-00042	Pages Affected: 5, 6, 25 - 30, 36
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:December 30, 2003

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a rigid polyisocyanurate foam panel manufacturing source.

Responsible Official:	Plant Manager
Source Address:	1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address:	1215 West Dewey Street, Bremen, Indiana 46506
SIC Code:	3086
County Location:	Marshall
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) foam head, known as EU1, uncontrolled and exhausting through Stack 202, capacity: 13,100 pounds of polyisocyanurate mixture per hour.

(b) One (1) foaming laminator, identified as EU2, exhausting through Stack 201, capacity: 13,100 pounds of polyisocyanurate mixture per hour.

(c) One (1) inline cutting process, known as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour. The dust collector system consists of a primary baghouse, and a secondary pre-filter dust collector that is only utilized when the primary baghouse malfunctions.

(d) One (1) foot slicer, identified as FS, capacity: 640 board feet per hour.

(e) One (1) panel saw, identified as PS, capacity: 640 board feet per hour.

(f) One (1) warehouse area, known as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.

(g) One (1) waste recycling process, known as EU5, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day.

(b) Cricket saw with particulate matter emissions less than 5 pounds per hour of 25 pounds per day.

(c) One (1) maintenance wire welder, capacity: 120 pounds of welding wire per year.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to

be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on

the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the

certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information

shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAQ upon receiving a timely and complete application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]
Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAQ shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive months

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive months; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive months.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days (this time frame is determined on a case by case basis, but no more than ninety (90) days) after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour this time frame is determined on a case by case basis until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(d) All storage containers containing ozone depleting substances identified in 40 CFR 82.102 (a) or (b), unless otherwise exempted, shall bear warning labels pursuant to 40 CFR 82.106. Pursuant to 40 CFR 82.108, these labels shall be clearly legible and conspicuous.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Rigid Polyisocyanurate Foam Panel Manufacturing

(a) One (1) foam head, known as EU1, uncontrolled and exhausting through Stack 202, capacity: 13,100 pounds of polyisocyanurate mixture per hour.

(b) One (1) foaming laminator, identified as EU2, exhausting through Stack 201, capacity: 13,100 pounds of polyisocyanurate mixture per hour.

(c) One (1) inline cutting process, known as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour. The dust collector system consists of a primary baghouse, and a secondary pre-filter dust collector that is only utilized when the primary baghouse malfunctions.

(d) One (1) foot slicer, identified as FS, capacity: 640 board feet per hour.

(e) One (1) panel saw, identified as PS, capacity: 640 board feet per hour.

(f) One (1) warehouse area, known as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.

(g) One (1) waste recycling process, known as EU5, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The allowable PM emission rate from the inline cutting process (EU3) shall not exceed 14.4 pounds per hour when operating at a process weight rate of 13,100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) The allowable PM emission rate from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per

hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 PM_{10} [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4:

(a) PM_{10} emissions from the inline cutting process (EU3) exhausting through Stack BH-1 shall not exceed 14.4 pounds per hour.

(b) PM_{10} emissions from the waste recycling process (EU5) exhausting through Stack BH-2 shall not exceed 3.99 pounds per hour.

(c) The total amount of foam panels delivered to the waste recycling process (EU5) shall be limited to less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions less than 4.65 tons per year, based on the measured emission rate of 0.0093 pounds of VOC per board foot of foam panel recycled.

(d) Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

(a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.

(b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.

(c) Condition D.1.3(a) only applies when the inline cutting process (EU3) is in operation using VOC based blowing agents.

(d) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device if applicable.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

No later than 180 days after initial start-up, the Permittee shall perform VOC testing of the regenerative thermal oxidizer exhausting through Stack CD-1 to determine the capture and destruction efficiencies for overall VOC control utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

D.1.6 Particulate Matter (PM)

(a) The cyclone and baghouse dust collector system for PM control shall be in operation at all times when the inline cutting process (EU3) is in operation and exhausting to the outside atmosphere or to the regenerative thermal oxidizer.

(b) The dust collector system for PM control shall be in operation at all times when the hogger in the waste recycling process (EU5) is in operation and exhausting to the outside atmosphere.

D.1.7 Thermal Oxidizer Operation

The thermal oxidizer shall operate at all times that the inline cutting process (EU3) is in operation cutting foam produced with VOC based blowing agents. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) overall (capture and destruction) control of the volatile organic compound (VOC).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the inline cutting process (EU3) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When the foaming process (EU1) and inline cutting process (EU3) are operating using HCFC based blowing agents (the thermal oxidizer is not in use), these observations should be made of the visible emissions from the baghouse stack, BH-1. When the inline cutting process (EU3) is operating using VOC based blowing agents, these observations should be made of the visible emissions from the thermal oxidizer stack, CD-1. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the waste recycling process stack exhaust (BH-2) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.9 Parametric Monitoring - Baghouse

(a) The Permittee shall record the total static pressure drop across the baghouse dust collector system (BH-1) used in conjunction with the inline cutting process (EU3), at least once daily when the cutting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the primary baghouse shall be maintained within the range of 0.5 and 6.0 inches

of water or a range established during the latest stack test. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the secondary emergency dust collector shall be maintained within the range of 0.1 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(b) The Permittee shall record the total static pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process, at least once daily when the waste recycling process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.1 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) The instruments used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.1.11 Volatile Organic Compounds (VOC)

The regenerative thermal oxidizer shall be in operation at all times when inline cutting process (EU3) is in operation cutting foam produced with VOC based blowing agents.

D.1.12 Parametric Monitoring - Regenerative Thermal Oxidizer

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of the amount of foam panels delivered to the waste recycling process (EU5).

(b) To document compliance with Condition D.1.3, the Permittee shall maintain the following:

(1) Records of materials used that contain VOC's. These records shall include purchase orders, invoices, and other information necessary to verify the type and amount used.

(2) Monthly throughput records of the number of board feet of rigid polyisocyanurate foam panels manufactured.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the visible emission notations of the inline cutting process (BH-1 or CD-1) and waste recycling (BH-2) stack exhausts once per shift.

(d) To document compliance with Condition D.1.9, the Permittee shall maintain the following:

(1) Daily records of the total static pressure drop across each baghouse during normal operation when venting to the atmosphere.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(e) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

(1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(2) Weekly records of the duct pressure or fan amperage.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c) and D.1.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

(a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day, except if subject to 326 IAC 20-6.

(b) Cricket saw with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(c) One (1) maintenance wire welder, capacity: 120 pounds of welding wire per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38?C) (one hundred degrees Fahrenheit (100?F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of

mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38?C) (one hundred degrees Fahrenheit (100?F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38?C) (one hundred degrees Fahrenheit (100?F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9?C) (one hundred twenty degrees Fahrenheit (120?F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the cricket saw shall be limited by the following.

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No. 2

? 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ? The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

? 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
- ? The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042
FESOP Revision No.: FR099-14499-00042
Facility: Entire Source
Parameter: Rigid Polyisocyanurate Foam Panels
Limit: Less than 678,356,560 board feet per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Foam Panel Throughput This Month (Board Feet)	Foam Panel Throughput Previous 11 Months (Board Feet)	Foam Panel Throughput 12 Month Total (Board Feet)
Month 1			
Month 2			
Month 3			

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042
FESOP Revision No.: 099-17820-00042
Facility: EU5
Parameter: Amount of rigid polyisocyanurate foam panels delivered to the process
Limit: Less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Foam Panel Throughput (Board Feet)	Foam Panel Throughput (Board Feet)	Foam Panel Throughput (Board Feet)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-8546-00042

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Johns Manville**
Source Location:	**1215 West Dewey Street, Bremen, Indiana 46506**
County:	**Marshall**
SIC Code:	**3086**
Operation Permit No.:	**F 099-8546-00042**
Significant Permit Revision No.:	**SPR 099-17820-00042**
Permit Reviewer:	**Edward A. Longenberger**

On October 29, 2003, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Johns Manville had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to operate a rigid polyisocyanurate foam panel manufacturing source with baghouses, dust collectors and a thermal oxidizer as control. The notice also stated that OAQ proposed to issue a Significant Permit Revision for this operation and provided information on how the public could review the proposed Significant Permit Revision and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision to a FESOP should be issued as proposed.

On November 20, 2003, Raymond Darmer of Johns Manville submitted comments on the proposed Significant Permit Revision to a FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

As the regenerative thermal oxidizer (RTO) controls VOC emissions for only the inline cutting process (EU3), Condition D.1.3(c) requires correction by removing the reference to the foaming process (EU1) as follows:

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

(a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.

(b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.

(c) These conditions only apply when the ~~foaming process (EU1) and~~ inline cutting process (EU3) are in operation using VOC based blowing agents.

Response 1:

IDEM, OAQ understands that the Permittee wishes to clarify that since the RTO only controls VOC emissions from the inline cutting process (EU3), operation of the RTO is only necessary when EU3 is in operation. However, it must remain clear that Condition D.1.3(b), which contains the throughput limitation for the entire foam panel manufacturing process (EU1 through EU5), is applicable at all times that any part of the manufacturing process is in operation and using VOC based blowing agents. Therefore, Condition D.1.3 is changed as shown:

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

(a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.

(b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.

(c) ~~These conditions only apply~~ **Condition D.1.3(a) only applies** when the ~~foaming process (EU1) and~~ inline cutting process (EU3) **is** ~~are~~ in operation using VOC based blowing agents.

(d) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.

Comment 2:

To be consistent with Condition D.1.12(b) and information provided in the permit revision application, Condition D.1.7 requires correction to indicate fan amperage **or** duct velocity, as shown:

D.1.7 Thermal Oxidizer Operation

The thermal oxidizer shall operate at all times that the inline cutting process (EU3) is in operation cutting foam produced with VOC based blowing agents. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage ~~and~~ **or** duct velocity determined in a stack test to maintain a minimum ninety percent (90%) overall (capture and destruction) control of the volatile organic compound (VOC).

Response 2:

Condition D.1.7 is the requirement which states that the afterburner shall operate at a temperature of 1,400 degrees Fahrenheit until the stack testing required by Condition D.1.5 is performed. After the stack testing is performed, the afterburner is required to operate at a temperature, fan amperage, and duct velocity which has proven to be sufficient to ensure 90% VOC control.

Condition D.1.12, which is in the Compliance Monitoring section of the permit, states that the Permittee may choose to record the duct pressure or the fan amperage once per week, in order to demonstrate that the thermal oxidizer is operating properly. The fact that the Permittee is given a choice of which parameter to monitor does not relieve the Permittee of the requirement to operate the

control device at the temperature, fan amperage and duct velocity which has been determined to be sufficient to maintain 90% VOC control. Therefore, no change to Condition D.1.7 has been made as a result of this comment.

Comment 3:

The third sentence makes reference to the foaming process (EU1). This reference should be deleted, as EU1 is no longer ducted to the RTO and Stack CD-1.

Response 3:

Condition D.1.8 requires visible emission notations of the inline cutting process (EU3). Since the foaming process (EU1) is no longer ducted to the RTO, the reference to the foaming process is deleted as follows:

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the inline cutting process (EU3) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When the foaming process (EU1) and inline cutting process (EU3) are operating using HCFC based blowing agents (the thermal oxidizer is not in use), these observations should be made of the visible emissions from the baghouse stack, BH-1. When the ~~foaming process (EU1) and~~ inline cutting process (EU3) **is** ~~are~~ operating using VOC based blowing agents, these observations should be made of the visible emissions from the thermal oxidizer stack, CD-1. A trained employee shall record whether emissions are normal or abnormal.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**Johns Manville**
Source Location:	**1215 West Dewey Street, Bremen, Indiana 46506**
County:	**Marshall**
SIC Code:	**3086**
Operation Permit No.:	**F 099-8546-00042**
Operation Permit Issuance Date:	**June 15, 1999**
Significant Permit Revision No.:	**SPR 099-17820-00042**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Johns Manville relating to the construction and operation of the following emission units and pollution control devices:

One (1) maintenance wire welder, capacity: 120 pounds of welding wire per year (deemed an insignificant activity).

History

Johns Manville was issued a Federally Enforceable State Operating Permit (FESOP) on June 15, 1999. A significant permit revision (SPR 099-14499-00042) was issued on October 16, 2001. On August 15, 2003, Johns Manville submitted an application to the OAQ requesting to shorten the official name of the company from Johns Manville International to Johns Manville, and to request some changes to the emission unit identification numbers. The applicant wishes to clarify that two existing sawing operations, the foot slicer (FS) and the panel saw (PS), should not be listed as part of the inline cutting operations. The company also requested to amend the standard pressure drop ranges across the baghouses, based on recent stack test results. Finally, the applicant has requested to update the source-wide potential emissions from each emission unit, based on the emission factors derived from recent stack tests, and has requested that a 1,000,000 board feet per year limitation be placed on the waste recycling process (EU5). The source is not constructing any new significant emission units.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional

information submitted by the applicant.

An application for the purposes of this review was received on August 15, 2003. Additional information was received on September 23, 2003.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the modification requires the addition of a Federally Enforceable limitation on the potential to emit, and the associated record keeping and reporting requirements, pursuant to 326 IAC 2-8-4.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marshall County has been classified as attainment or unclassifiable for all remaining criteria pollutant(s). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of Entire Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units

after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Foam head (EU1)	-	-	-	7.70	-	-	-
Foaming laminator (EU2)	-	-	-	15.6	-	-	-
Inline cutting saws (EU3)	4.48	4.48	-	3.10	-	-	-
Foot slicer (FS)	0.160	0.160	-	0.006	-	-	-
Panel saw (PS)	0.080	0.080	-	0.006	-	-	-
Warehouse area (EU4)	-	-	-	2.62	-	-	-
Waste recycling (EU5)	0.835	0.835	-	4.65	-	-	-
New welder	neg.	neg.	-	-	-	-	-
Existing insignificant activities	1.75	1.75	0.05	1.33	1.80	7.45	-
Total Emissions	7.30	7.30	0.05	35.0	1.80	7.45	-

Federal Rule Applicability

There are no changes to the Federal Rule Applicability as a result of this permit revision.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New facilities; general reduction requirements)

The applicant notes that the current operating permit lists the foot slicer (FS) and panel saw (PS) as part of the inline cutting operations (formerly EU2, now EU3). In fact, the foot slicer and panel saw are not part of the one (1) rigid polyisocyanurate foam panel manufacturing line, and therefore should be listed as separate emission units. The foot slicer and panel saw are used to cut unused boards so that they can be used as spacers in the storage area, or for cutting custom-sized panels for customers. The foot slicer and panel saw each have a capacity of 640 board feet per hour. The unrestricted potential to emit of VOC from each unit, before controls, is 0.589 tons per year, and therefore they are not subject to the requirements of 326 IAC 8-1-6.

State Rule Applicability - Insignificant Activities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9), the requirements of 326 IAC 6-3-2 are not applicable to the new maintenance wire welder, because the welder will consume less than 625 pounds of wire per day.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

On January 1, 2001, the IDEM, Office of Air Management changed its name to the Office of Air Quality. This change has been made throughout the permit. Also, Johns Manville has changed its name from Johns Manville International to Johns Manville. This change has been made throughout the permit.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a rigid polyisocyanurate foam panel manufacturing source.

Responsible Official:	**Plant Manager** ~~Ray Darmer~~
Source Address:	1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address:	1215 West Dewey Street, Bremen, Indiana 46506
SIC Code:	3086
County Location:	Marshall
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) foam **head**~~ing process~~, known as EU1, ~~consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, foaming laminator, exhausting through stacks 201, 202 and 203,~~ **uncontrolled and exhausting through Stack 202, capacity: 13,100 pounds of polyisocyanurate mixture per hour.**

(b) One (1) foaming laminator, identified as EU2, exhausting through Stack 201, capacity: 13,100 pounds **of polyisocyanurate mixture** per hour.

(**c** ~~b~~) One (1) **inline** cutting process, known as EU**3**~~2~~, consisting of an edge trim saw, cross cut saw, **and** gang saw, ~~foot saw, panel saw and packaging line,~~ equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour. **The dust collector system consists of a primary baghouse, and a secondary pre-filter dust collector that is only utilized when the primary baghouse malfunctions.**

(d) One (1) foot slicer, identified as FS, capacity: 640 board feet per hour.

(e) One (1) panel saw, identified as PS, capacity: 640 board feet per hour.

(**f** ~~c~~) One (1) warehouse area, known as EU**4**~~3~~, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.

(**g** ~~d~~) One (1) waste recycling process, known as EU**5**~~4~~, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day.

(b) Cricket saw with particulate matter emissions less than 5 pounds per hour of 25 pounds per day.

(c) One (1) maintenance wire welder, capacity: 120 pounds of welding wire per year.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Rigid Polyisocyanurate Foam Panel Manufacturing

(a) One (1) foam **head**~~ing process~~, known as EU1, ~~consisting of a bulk storage and batching system, chemical feed and laydown area, facer feed area, foaming laminator, exhausting through stacks 201, 202 and 203,~~ **uncontrolled and exhausting through Stack 202, capacity: 13,100 pounds of polyisocyanurate mixture per hour.**

(b) One (1) foaming laminator, identified as EU2, exhausting through Stack 201, capacity: 13,100 pounds **of polyisocyanurate mixture** per hour.

(**c** ~~b~~) One (1) **inline** cutting process, known as EU**3**~~2~~, consisting of an edge trim saw, cross cut saw, **and** gang saw, ~~foot saw, panel saw and packaging line,~~ equipped with one (1) cyclone and baghouse dust collector system with a flow rate of 20,160 acfm, exhausting through stack BH-1, and equipped with one regenerative thermal oxidizer for VOC control, exhausting through stack CD-1, capacity: 77,438 board feet per hour. **The dust collector system consists of a primary baghouse, and a secondary pre-filter dust collector that is only utilized when the primary baghouse malfunctions.**

(d) One (1) foot slicer, identified as FS, capacity: 640 board feet per hour.

(e) One (1) panel saw, identified as PS, capacity: 640 board feet per hour.

(**f** ~~c~~) One (1) warehouse area, known as EU**4**~~3~~, consisting of curing, staging and shipping areas for the finished panels, capacity: 77,438 board feet per hour.

(**g** ~~d~~) One (1) waste recycling process, known as EU**5**~~4~~, equipped with one (1) hogger, equipped with a dust collector exhausting through stack BH-2, capacity: 11,520 board feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The allowable PM emission rate from the **inline** cutting process (EU**3**~~2~~) shall not exceed 14.4

pounds per hour when operating at a process weight rate of 13,100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) The allowable PM emission rate from the waste recycling process (EU**5**~~4~~) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 PM_{10} [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4:

(a) PM_{10} emissions from the **inline** cutting process (EU**3**~~2~~) exhausting through Stack BH-1 shall not exceed 14.4 pounds per hour.

(b) PM_{10} emissions from the waste recycling process (EU**5**~~4~~) exhausting through Stack BH-2 shall not exceed 3.99 pounds per hour.

(c) The total amount of foam panels delivered to the waste recycling process (EU5) shall be limited to less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions less than 4.65 tons per year, based on the measured emission rate of 0.0093 pounds of VOC per board foot of foam panel recycled.

(**d** ~~c~~) Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements), BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined as follows:

(a) A regenerative thermal oxidizer shall be in operation at all times that the **inline** cutting process (EU**3**~~2~~) is in operation, with an overall control efficiency of 90%.

(b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU**5**~~4~~) shall not exceed 678,356,560 board feet per consecutive 12 month period. This is the equivalent of VOC input production of 142 tons per year before controls, and PTE VOC of 53.8 tons per year after controls.

(c) These conditions only apply when the foaming process (EU1) and **inline** cutting process (EU~~3~~**2**) are in operation using VOC based blowing agents.

(d) Pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.

D.1.6 Particulate Matter (PM)

(a) The cyclone and baghouse dust collector system for PM control shall be in operation at all times when the **inline** cutting process (EU**3**~~2~~) is in operation and exhausting to the outside atmosphere or to the regenerative thermal oxidizer.

(b) The dust collector system for PM control shall be in operation at all times when the hogger in the waste recycling process (EU**5**~~4~~) is in operation and exhausting to the outside atmosphere.

D.1.7 Thermal Oxidizer Operation

The thermal oxidizer shall operate at all times that the **inline** cutting process (EU**3**~~2~~) is in operation cutting foam produced with VOC based blowing agents. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) overall (capture and destruction) control of the volatile organic compound (VOC).

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the **inline** cutting process (EU**3**~~2~~) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. When the foaming process (EU1) and **inline** cutting process (EU**3**~~2~~) are operating using HCFC based blowing agents (the thermal oxidizer is not in use), these observations should be made of the visible emissions from the baghouse stack, BH-1. When the foaming process (EU1) and **inline** cutting process (EU**3**~~2~~) are operating using VOC based blowing agents, these observations should be made of the visible emissions from the thermal oxidizer stack, CD-1. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the waste recycling process stack exhaust (BH-2) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.9 Parametric Monitoring - Baghouse

(a) The Permittee shall record the total static pressure drop across the baghouse **dust collector system** (BH-1) used in conjunction with the **inline** cutting process **(EU3)**, at least once daily when the cutting process is in operation when venting to the atmosphere. Unless operated

under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the **primary** baghouse shall be maintained within the range of **0.5** ~~3.0~~ and 6.0 inches of water or a range established during the latest stack test. **Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the secondary emergency dust collector shall be maintained within the range of 0.1 and 6.0 inches of water or a range established during the latest stack test.** The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(b) The Permittee shall record the total static pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process, at least once daily when the waste recycling process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of **0.1** ~~4.0~~ and **6.0** ~~9.0~~ inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) The instruments used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.11 Volatile Organic Compounds (VOC)

The regenerative thermal oxidizer shall be in operation at all times when **inline** cutting process (EU**3**~~2~~) is in operation cutting foam produced with VOC based blowing agents.

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of the amount of foam panels delivered to the waste recycling process (EU5).

(**b** ~~a~~) To document compliance with Condition D.1.3, the Permittee shall maintain the following:

(1) Records of materials used that contain VOC's. These records shall include purchase orders, invoices, and other information necessary to verify the type and amount used.

(2) Monthly throughput records of the number of board feet of rigid polyisocyanurate foam panels manufactured.

(**c** ~~b~~) To document compliance with Condition D.1.8, the Permittee shall maintain records of the visible emission notations of the **inline** cutting process (BH-1 or CD-1) and waste recycling (BH-2) stack exhausts once per shift.

(**d** ~~c~~) To document compliance with Condition D.1.9, the Permittee shall maintain the following:

(1) Daily records of the **total static pressure drop across each baghouse** ~~following operational parameters~~ during normal operation when venting to the atmosphere~~:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure~~.

(2) Documentation of all response steps implemented, per event.
(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(**e** ~~d~~) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

(1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(2) Weekly records of the duct pressure or fan amperage.

(**f** ~~e~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s D.1.2(c) and** D.1.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

(a) Cold cleaning degreaser VOC emissions that do not exceed 3 pounds per hour or 15 pounds per day, except if subject to 326 IAC 20-6.

(b) Cricket saw with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(c) One (1) maintenance wire welder, capacity: 120 pounds of welding wire per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: **Johns Manville**
Source Address: **1215 West Dewey Street, Bremen, Indiana 46506**
Mailing Address: **1215 West Dewey Street, Bremen, Indiana 46506**
FESOP No.: **F 099-8546-00042**
FESOP Revision No.: **099-17820-00042**
Facility: **EU5**
Parameter: **Amount of rigid polyisocyanurate foam panels delivered to the process**
Limit: **Less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month**

YEAR: _____

Month	Foam Panel Throughput (Board Feet)	Foam Panel Throughput (Board Feet)	Foam Panel Throughput (Board Feet)
	This Month	Previous 11 Months	12 Month Total

? **No deviation occurred in this month.**

? **Deviation/s occurred in this month.**
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 099-17820-00042.

Appendix A: Emission Calculations
Emission Calculations

Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
SPR: 099-17820
Plt ID: 099-00042
Permit Reviewer: Edward A. Longenberger
Date: August 15, 2003

Emission Unit	Max Capacity	Pollutant	Emission Factor	Source of Emission Factor	Control Efficiency %	PM (tons/yr)	PM-10 (tons/yr)	SOx (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Foam Head (EU1)	77,438	VOC	2.27E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	7.70	0.00
	bdft/hr		(lb/bdft)								
Foaming Laminator (EU2)	77,438	VOC	4.61E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	15.6	0.00
	bdft/hr		(lb/bdft)								
Inline Cutting Saws (EU3)	77,438	PM	1.32E-03	Mass Bal	99.00%	4.48	4.48	0.00	0.00	3.10	0.00
	bdft/hr	PM-10	1.32E-03	Mass Bal	99.00%						
		VOC	4.81E-04	Stack Test	98.10%						
			(lb/bdft)								
Foot Slicer (FS)	640	PM	5.70E-03	Mass Bal	99.00%	0.160	0.160	0.00	0.00	0.011	0.00
	bdft/hr	PM-10	5.70E-03	Mass Bal	99.00%						
		VOC	2.10E-04	Mass Bal	98.10%						
			(lb/bdft)								
Panel Saw (PS)	640	PM	2.85E-03	Mass Bal	99.00%	0.080	0.080	0.00	0.00	0.011	0.00
	bdft/hr	PM-10	2.85E-03	Mass Bal	99.00%						
		VOC	2.10E-04	Mass Bal	98.10%						
			(lb/bdft)								
Maintenance Wire Welder	120	PM	5.2	AP-42	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	lbs/yr	PM-10	5.2	AP-42	0.00%						
			(lb/1000 lbs wire)								
Warehouse Area (EU4)	77,438	VOC	7.71E-06	Mass Bal	0.00%	0.00	0.00	0.00	0.00	2.62	0.00
	bdft/hr		(lb/bdft)								
Waste Recycling (EU5)	1,000,000	PM	1.67E-03	Mass Bal	99.00%	0.835	0.835	0.00	0.00	4.65	0.00
	bdft/yr	PM-10	1.67E-03	Mass Bal	99.00%						
		VOC	9.30E-03	Mass Bal	0.00%						
			(lb/bdft)								
Existing Insignificant Activities						1.75	1.75	0.05	7.45	1.33	1.80
TOTAL						**7.30**	**7.30**	**0.05**	**7.45**	**35.05**	**1.80**

METHODOLOGY

Emissions = Max Capacity x Emission Factor x (1 - Control Efficiency)